

Chairman Powell, Commissioner Abernathy, Commissioner Copps, Commissioner Martin and Commissioner Adelstein:

I wish to comment on a few things in the document. I feel that Voice tracking, is not in itself a problem, but your definition, commonly known as "cyber jocking" is a problem. Voice tracking, when done locally at a station, in my mind is ok. For example, say you have a jock that has a doctors appointment or some other kind of situation where they need a few hours of their air shift off, they can easily pre-record their voice tracks into the computer and still cover their shift. The problem comes when a station uses this method to cover an air shift with a DJ from out of town. For a while a station in Chicago was using this method to bring in a morning show from Los Angeles. While this was a cost effective measure for them, it failed when an emergency hit. On the morning of September 11th 2001, WKSC-FM Chicago "Kiss 103.5" was running their cyber-jocked morning show and made no mention of what had happened in New York City or Washington DC. Had a local person been in the studio they would have been able to relay the information to the public as was done on almost every other station having a live person in the studio. I think the commission, if not ban cyberjocking, at least require that an operator be on duty at the broadcast station with the authority and knowledge of how to interrupt the broadcast to inform the public of an important national or local emergency.

This leads to the next thing. While I don't think that stations should be required to run updates 24/7/365, I believe that they should make some effort to have a news product on the air. I know that there are people who would argue that "kids today don't care about hearing news, they just want the hits" I would argue differently. While they don't appear to "care", a majority of kids do in fact keep up with what is going on. Having a local news presence is important to community service of the station.

Community service, is also an important matter. While there should be some effort at serving a community (unlike most stations, while licensed to a smaller community, target a larger city). The Commission needs to establish something in regards to this, whether it be a mandatory block of Community Affairs programming, or requiring the studios of the station be in the community of license, and not just within their signal area. Case in point, many of the stations licensed to Suburban Chicago have since moved their studios into large office buildings downtown, which do not provide for suitable access by the members of the community.

The last thing that I would like to address is LPFM. LPFM is a wonderful idea. I was at a 4-year university who would have applied for an LPFM had more station allocations been available. The biggest thing that needs to be done to the LPFM service is the elimination of the 3rd adjacent rule. If translator stations can survive in the 2nd adjacent of a full-power broadcast station, than local LPFM stations, which run at equivalent power levels, should be allowed to be there also, contrary to what the NAB and others are saying.

Thank you,

Adam Chernow